

KML LAW GROUP, P.C.

A Professional Corporation incorporated in Pennsylvania

701 Market Street, Suite 5000

Philadelphia, PA 19106

(215) 627-1322

Attorneys for MidFirst Bank

IN THE MATTER OF:

Millie Z Gomez fka Milagros Z Gomez

DEBTOR(S),

Arnaldo D Arce

CO-DEBTOR

TO:

Millie Z. Gomez fka Milagros Z Gomez

649 West Grand Avenue

Unit 1

Rahway, NJ 07065

Justin M. Gillman

Gillman & Gillman

770 Amboy Avenue

Edison, NJ 08837

**IN THE UNITED STATES
BANKRUPTCY COURT FOR THE
DISTRICT OF NEW JERSEY**

CHAPTER 13
CASE NO. 19-10834 SLM

**NOTICE OF MOTION FOR RELIEF
FROM STAY AND CO-DEBTOR STAY**

Marie-Ann Greenberg

30 Two Bridges Road; Suite 330 (VIA ECF)

Fairfield, NJ 07004

US TRUSTEE

Office of the US Trustee

One Newark Center, Suite 2100

Newark, NJ 07102

PLEASE TAKE NOTICE THAT the undersigned attorney for **MidFirst Bank**, will apply to the UNITED STATES BANKRUPTCY COURT, located at **50 Walnut Street 3rd fl., Newark, NJ**, for an Order to Grant Relief from the Automatic Stay to authorize the moving parties to prosecute a foreclosure action for the reason that the debtors and co-debtors have failed to maintain their monthly mortgage payments to the Secured Creditor as more particularly set forth in the certification submitted herewith. Costs and counsel fees will also be requested. The property involved is known as **649 West Grand Avenue #1, Rahway NJ 07065**. The hearing on this matter is scheduled for **May 24, 2023 at 10:00 AM**

Dated: May 01, 2023

/s/Denise Carlon

Denise Carlon, Esquire

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